

Having finally read and digested the Manomet study on the carbon impact of Biomass combustion, I have several concerns.

First, it appears that the focus was on the harvesting and burning of whole tree chips as opposed to waste wood, such as tops, branches, etc. I think this skews the study and I hope it was not an intention from the start. I'm wondering what the Commonwealth bought.

Second, assuming the study results are valid, the Commonwealth must quickly commission another study to examine the negative effects of domestic wood burning such as home heating through stoves and even larger heating applications. These types of biomass combustion not only use the same or even less efficient harvesting techniques, but also pay little or no attention to particulate collection or other flue gas treatment for NOx and CO that the larger and more sophisticated biomass combustors are required to perform. While this particular study's scope did not include this type of usage, I think you will agree that if your concern for carbon footprint is genuine, Massachusetts will address this problem.

Finally, I'm concerned that the Secretary made a premature statement as to the direction of the Commonwealth's policies on Biomass combustion before considering the public comments the cover letter requested. As the current rate hearings for Cape Wind should suggest, there is no perfect energy source and we must blend all of our renewable energy possibilities into existing energy reserves along with meaningful conservation (which will require individual sacrifices) measures to both address our future electrical needs and our very legitimate environmental concerns.

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